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Louise Regional Hospital

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION**

In re

VERITY HEALTH SYSTEM OF CALIFORNIA,  
INC., *et al.*,

Debtors and Debtors in Possession.

- |  |  |
|--|--|
| <input type="checkbox"/> Affects All Debtors<br><input type="checkbox"/> Affects Verity Health System of California, Inc.<br><input checked="" type="checkbox"/> Affects O'Connor Hospital<br><input checked="" type="checkbox"/> Affects Saint Louise Regional Hospital<br><input type="checkbox"/> Affects St. Francis Medical Center<br><input checked="" type="checkbox"/> Affects St. Vincent Medical Center<br><input checked="" type="checkbox"/> Affects Seton Medical Center<br><input type="checkbox"/> Affects O'Connor Hospital Foundation<br><input type="checkbox"/> Affects Saint Louise Regional Hospital Foundation<br><input type="checkbox"/> Affects St. Francis Medical Center of Lynwood Foundation<br><input type="checkbox"/> Affects St. Vincent Foundation<br><input type="checkbox"/> Affects St. Vincent Dialysis Center, Inc.<br><input type="checkbox"/> Affects Seton Medical Center Foundation<br><input type="checkbox"/> Affects Verity Business Services<br><input type="checkbox"/> Affects Verity Medical Foundation<br><input type="checkbox"/> Affects Verity Holdings, LLC<br><input type="checkbox"/> Affects De Paul Ventures, LLC<br><input type="checkbox"/> Affects De Paul Ventures - San Jose Dialysis, LLC |  |
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Lead Case No. 2:18-bk-20151-ER

Jointly administered with:  
Case No. 2:18-bk-20162-ER;  
Case No. 2:18-bk-20163-ER;  
Case No. 2:18-bk-20164-ER;  
Case No. 2:18-bk-20165-ER;  
Case No. 2:18-bk-20167-ER;  
Case No. 2:18-bk-20168-ER;  
Case No. 2:18-bk-20169-ER;  
Case No. 2:18-bk-20171-ER;  
Case No. 2:18-bk-20172-ER;  
Case No. 2:18-bk-20173-ER;  
Case No. 2:18-bk-20175-ER;  
Case No. 2:18-bk-20176-ER;  
Case No. 2:18-bk-20178-ER;  
Case No. 2:18-bk-20179-ER;  
Case No. 2:18-bk-20180-ER;  
Case No. 2:18-bk-20181-ER.

Chapter 11 Cases

Hon. Ernest M. Robles

Adversary No. 20-ap-01559-ER

**JOINT STATUS REPORT RE  
ARBITRATION**

**[Related to Docket No. 25]**

ST. VINCENT MEDICAL CENTER, a California  
nonprofit public benefit corporation, SETON  
MEDICAL CENTER, a California nonprofit public  
benefit corporation, O'CONNOR HOSPITAL, a  
California nonprofit benefit corporation, and  
SAINT LOUISE REGIONAL HOSPITAL, a  
California nonprofit public benefit corporation,

Plaintiffs,

v.

BLUE SHIELD OF CALIFORNIA PROMISE  
HEALTH PLAN f/k/a CARE 1<sup>ST</sup> HEALTH  
PLAN, a California corporation,

Defendant.

Present Hearing:

Date: June 15, 2021  
Time: 10:00 a.m.  
Place: Courtroom 1568  
255 East Temple Street  
Lost Angeles, CA 90012

St. Vincent Medical Center, Seton Medical Center, O'Connor Hospital and Saint Louise  
Regional Hospital (collectively "Plaintiffs") and Defendant Blue Shield of California Promise  
Health Plan f/k/a Care 1<sup>st</sup> Health Plan ("Defendant," ) and with Plaintiffs, each a "Party" and  
collectively the "Parties"), by and through their respective counsel, herein report as follows:

On December 22, 2020, the Court entered its *Order Approving Stipulation Resolving  
Defendants' Motion to (1) Dismiss Claims for Turnover, Violation of the Automatic Stay, and Unjust  
Enrichment; and (2) Compel Arbitration and Stay Adversary Proceeding* [Dkt No. 25] (the "Order").

Pursuant to Paragraph 6 of the Order, the Court set June 15, 2021 at 10:00 a.m. as the date  
for a status conference in relation to the Order.

Plaintiffs represent that on May 28, 2021, through their arbitration counsel, the Law Offices  
of Stephenson Acquisto & Colman, they filed their arbitration demands with the American Health  
Law Association ("AHLA") pursuant to the terms of the agreements between the Parties and will  
serve same on Defendant upon issuance of case numbers by AHLA.

The Parties request that that Court set a further Status Conference on the first available court  
date six months hence.

1 Dated: June 4, 2021

PACHULSKI STANG ZIEHL & JONES LLP

2  
3 /s/ Steven J. Kahn

4 Steven J. Kahn

5 Gail S. Greenwood

6 Counsel for St. Vincent Medical Center, Seton Medical  
Center, O'Connor Hospital, and Saint Louise Regional  
Hospital

7  
8 Dated: June 4, 2021

SNELL & WILMER LLP

9  
10 /s/ Michael B. Reynolds

11 Michael B. Reynolds

12 Andrew B. Still

13 Counsel for Blue Shield of California Promise Health  
Plan f/k/a Care 1<sup>st</sup> Health Plan

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
**10100 Santa Monica Boulevard, 13<sup>th</sup> Floor, Los Angeles, California 90067**

A true and correct copy of the foregoing document entitled (*specify*): **JOINT STATUS REPORT RE ARBITRATION** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **June 4, 2021**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Steven J Kahn** skahn@pszyjw.com
- **Michael B Reynolds** mreynolds@swlaw.com, kcollins@swlaw.com
- **Andrew Still** astill@swlaw.com, kcollins@swlaw.com
- **United States Trustee (LA)** ustpregion16.la.ecf@usdoj.gov

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 4, 2021  
Date

Mary de Leon  
Printed Name

/s/ Mary de Leon  
Signature